

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

IN RE: TAASERA LICENSING LLC,
PATENT LITIGATION § Case No. 2:22-md-03042-JRG

THIS DOCUMENT RELATES TO §
CASE NO. 2:22-cv-00427-JRG §

TAASERA LICENSING LLC, § Case No. 2:22-cv-00427-JRG
Plaintiff, §
v. §
MUSARUBRA US LLC, D/B/A TRELLIX, §
Defendant. §

JOINT MOTION TO EXTEND THE STAY OF ALL DEADLINES

Plaintiff Taasera Licensing LLC (“Plaintiff” or “Taasera”) and Defendant Musarubra US LLC, d/b/a Trellix (“Trellix” or “Defendant”) (collectively, the “Parties”) hereby file this Joint Motion to Extend the Stay of All Deadlines.

All matters in controversy between the Parties have been settled in principle and, on January 4, 2024, the Parties jointly moved to stay all deadlines and provided notice of settlement (Dkt.68). On January 5, 2024, this Court stayed the cases until February 9, 2024 (Dkt.70).

The Parties respectfully and jointly request that the Court extend the stay of all case deadlines for thirty (30) days to allow the Parties to finalize the settlement documents.

WHEREFORE, the Parties respectfully request that the Court enter the proposed order submitted with this motion as set forth above.

Dated: February 8, 2024

Respectfully submitted,

/s/ Alfred R. Fabricant

Alfred R. Fabricant
NY Bar No. 2219392
Email: ffabricant@fabricantllp.com
Peter Lambrianakos
NY Bar No. 2894392
Email: plambrianakos@fabricantllp.com
Vincent J. Rubino, III
NY Bar No. 4557435
Email: vrubino@fabricantllp.com
Joseph M. Mercadante
NY Bar No. 4784930
Email: jmercadante@fabricantllp.com
FABRICANT LLP
411 Theodore Fremd Avenue,
Suite 206 South
Rye, New York 10580
Telephone: (212) 257-5797
Facsimile: (212) 257-5796

Justin Kurt Truelove
State Bar No. 24013653
Email: kurt@truelovelawfirm.com
TRUELOVE LAW FIRM, PLLC
100 West Houston Street
Marshall, Texas 75670
Telephone: (903) 938-8321
Facsimile: (903) 215-8510

Samuel F. Baxter
State Bar No. 01938000
Email: sbaxter@mckoolsmith.com
Jennifer L. Truelove
State Bar No. 24012906
Email: jtruelove@mckoolsmith.com
MCKOOL SMITH, P.C.
104 E. Houston Street, Suite 300
Marshall, Texas 75670
Telephone: (903) 923-9000
Facsimile: (903) 923-9099

**ATTORNEYS FOR PLAINTIFF
TAASERA LICENSING LLC**

/s/ Nathaniel St. Clair II

Nathaniel St. Clair, II

State Bar No. 24071564

Email: nstclair@jw.com

JACKSON WALKER LLP

2323 Ross Avenue, Suite 600

Dallas, Texas 75201

Telephone: (214) 953-5948

Facsimile: (214) 661-6848

***ATTORNEY FOR MUSARUBRA US LLC, d/b/a
TRELLIX***

CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on February 8, 2024, a true and correct copy of the foregoing document has been served via electronic mail on all counsel of record.

/s/ Alfred R. Fabricant
Alfred R. Fabricant

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that all counsel of record has met and conferred in accordance with Local Rule CV-7(h) and this joint motion is unopposed.

/s/ Alfred R. Fabricant
Alfred R. Fabricant